

II. REMARKS

Claims 1-10 are pending in this application. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1-10 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Wu (U.S. Patent No. 6,862,617), hereafter "Wu," in view of Bodnar *et al.* (U.S. Patent No. 6,295,541 B1). Applicants assert that the cited references do not teach or suggest each and every feature of the claimed invention. For example, with respect to independent claim 1, Applicants submit that the cited references fail to teach a table of keys that is separate from all storage systems that store the data in the first storage system and the second storage system. The Office admits that Wu does not teach this feature of the claimed invention. Instead, the Office argues that Bodnar teaches this feature. However, the passage of Bodnar that the Office cites indicates that the reference dataset is "...a super-set of the latest or most-recent data from all user datasets..." Abstract. To this extent, the superset of Bodnar stores the data that is included in the other systems and, as such, is not separate from all storage systems that store the data.

In contrast, the invention of claim 1 includes "...wherein the table of keys is separate from all storage systems that store the data in the first storage system and the second storage

system.” Claim 1. As such, the table of keys of the claimed invention is not merely a superset that stores data from other systems, but rather is separate from all storage systems that store the data in the first storage system and the second storage system. Thus, the superset of Bodnar does not teach or suggest the separateness of the table of keys of the claimed invention. Accordingly, Applicants respectfully request that the rejection be withdrawn.

With regard to claim 10, Applicants respectfully submit that the cited references do not teach or suggest that the first and second storage system do not separately maintain information for synchronizing the first and second storages system with each other. In contrast, the passages of Wu cited by the Office specifically teach systems for synchronizing on each of the two storage systems. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With regard to the Office's other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent claim listed above. In addition, Applicants submit that all dependant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserve the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejections.

III. CONCLUSION

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in

rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

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Respectfully submitted,



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